

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
vs.                         )                              No. 25-CR-879 JB  
                                )  
**HERIBERTO SALAZAR-AMAYA, et al.,**     )  
                                )  
Defendants.                 )

**NOTICE TO COURT REGARDING POSITION OF DEFENSE COUNSEL  
TO THE UNITED STATES' MOTION TO DECLARE CASE COMPLEX,  
AND MOTION FOR PROTECTIVE ORDER**

The United States of America, through its undersigned counsel, hereby notified the Court of the position of defense counsel on two pending motions filed by the United States; a Motion to Declare this Case Complex<sup>1</sup>, Doc.153; and 2) Motion for Protective Order, Doc. 155. This notice is filed in anticipation of the hearing currently scheduled on June 12, 2025, on these matters.

Defendant by Defense Counsel	Motion	Concurs	Objects	Takes No Position
Salazar-Amaya by Michael Severo	Declare Complex Protective Order			No position provided
Acuna-Moreno by Marshall Ray	Declare Complex Protective Order	X		X
Anesi by Diego Esquibel	Declare Complex Protective Order	X		X
Montoya by Susan Burgess-Farrell	Declare Complex Protective Order			X X
Sedillo by Paul Linnenburger	Declare Complex Protective Order	X		X
Navarette-Ramirez by Phillip Sapien	Declare Complex Protective Order	X	X	

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<sup>1</sup> Should the United States' Motion to Declare Case Complex be granted, the United States' Motion to Extend Discovery Deadlines, Doc. 154, will be rendered moot.

Defendant by Defense Counsel	Motion	Concurs	Objects	Takes No Position
Garcia by Jon Stanford	Declare Complex Protective Order	X		X
Lopez-Altamirano by Greg Acton	Declare Complex Protective Order	X		X
Martinez by Nicholas Hart	Declare Complex Protective Order		X X	
Singer by Joseph Shattuck	Declare Complex Protective Order	X X		
Tanner by Tom Clark	Declare Complex Protective Order	X X		
Young by Carey Bhalla	Declare Complex Protective Order		X	No position provided
Marquez by Tim Cornish	Declare Complex Protective Order	X	X	
Sanchez by John Anderson	Declare Complex Protective Order	X		X
DEFENDANTS TO BE ADDED BY SUPERSEDING INDICTMENT				
Lopez-Rubio by M. Naomi Salazar	Declare Complex Protective Order		X X	
Herrera by Mallory Gagen	Declare Complex Protective Order		X	X
Lovato by Todd Coberly	Declare Complex Protective Order	X		X
TOTALS	Declare Complex Protective Order	10 3	5 3	1 1 (no position Provided) 9 2 (no position Provided)

Respectfully submitted,

RYAN ELLISON  
United States Attorney

**Electronically filed on June 11, 2025**

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2025, I filed the foregoing document electronically through the CM/ECF system. Pursuant to the CM/ECF Administrative Procedures Manual, §§ 1(a), 7(b)(2), such filing is the equivalent of service on parties of record.

**Electronically filed on June 11, 2025**

Elaine Y. Ramírez  
Assistant United States Attorney